

REMARKS

The Office Action of May 21, 2007 has been carefully reviewed and considered by the Applicants. Claims 9, 12, 18 and 21 have been amended in order to clear an informality. Reconsideration of the application is hereby respectfully requested.

The Office Action

The Examiner rejected claims 9, 10, 12 and 18-22 under 35 U.S.C. §103(a). These claims were rejected as being unpatentable over Simon (U.S. Application No. 2002/0040375). Applicants respectfully traverse for at least the following reasons.

Independent Claims 9, 12, 18, 19 and 21 are not unpatenable over Simon.

The Examiner rejected all independent claims as being unpatentable over Simon. The Examiner references page 3, paragraph 51-58 and page 4, paragraphs 60-62. However, the claims patentably distinguish over the cited references.

By way of review, Simon is a method of organizing digital images on a page. Simon discloses a system software product and method for organizing a plurality of digital images in a predetermined page format. These digital images are grouped in a plurality of different page layouts and the page layouts are analyzed in accordance with predetermined criteria. The page layout is then selected based on the predetermined criteria. The predetermined criteria may include placing images in different page layouts in an overlapping pattern or scaling the page layouts so that they fit within a page format. However, Simon does not disclose using quantitative document intent information in order to create this page layout.

On the other hand, the instant disclosure claims quantitative document intent information. Even if predetermined criteria is used to suggest document intent information, Simon does not suggest that this document intent information be put in a quantitative form. Because all independent claims claim document intent information as quantitative, Simon cannot be said to render the claims obvious.

The Examiner acknowledges that Simon does not explicitly disclose a document intent vector. However, the Examiner states that Simon teaches optimization of page

layouts through the minimized cost function. However, this does not suggest a document intent vector. As claimed, a document intent vector is derived from quantitative document intent information. As stated previously, Simon does not disclose or suggest quantitative intent information at all. Therefore, it is not possible for Simon to disclose or suggest a document intent vector. The claimed disclosure relates decisions to value properties in an analytical way using quantitative analysis. This is not disclosed or suggested in the cited reference. It is therefore respectfully requested that the rejection to these claims be withdrawn.

Dependent claims 10, 20 and 22 are dependent from claims 9, 19 and 21, respectfully. Therefore, these claims are also currently in condition for allowance due to the reasons stated above. It is hereby requested that the rejections to these claims also be withdrawn. It is also submitted that all claims in the application are in condition for allowance.

CONCLUSION

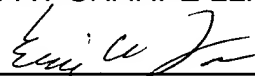
For the reasons detailed above, it is submitted all claims remaining in the application (Claims 9, 10, 12 and 18-22) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

No additional fee is believed to be required for this Amendment. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Joseph D. Dreher, at Telephone Number (216) 861-5582.

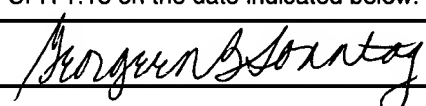
Respectfully submitted,

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7/23/07
Date

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<input type="checkbox"/>	transmitted to the USPTO by facsimile in accordance with 37 CFR 1.18 on the date indicated below.
Express Mail Label No.:	Signature: 
Date: <u>July 23, 2007</u>	Name: Georgeen B. Sonntag